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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 ALEKSEI BELIAKOV,

12 Plaintiff,

13 v.

14 KRISTI NOEM, in her official capacity as  
15 Secretary of the United States Department of  
Homeland Security, *et al.*,

16 Defendants.  
17

Case No. 3:25-cv-01498 TSH

**JOINT STATUS REPORT IN RESPONSE TO  
THE COURT'S ORDER AND STIPULATION  
TO CONTINUE THE DEADLINE FOR  
DEFENDANTS' RESPONSE TO PLAINTIFF'S  
COMPLAINT; AND [PROPOSED] ORDER**

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19 Plaintiff and Defendants hereby respond to the Court's order directing the parties to provide a  
20 joint status report, Dkt. No. 11, and the parties submit this stipulation requesting the Court to continue  
21 the deadline for Defendants' response to Plaintiff's complaint. On May 29, 2025, the Court granted the  
22 parties' stipulation to extend time for Defendants' response to Plaintiff's complaint, setting the due date  
23 for Defendants' response to May 28, 2025. *See* Dkt. 14. Defendants inadvertently missed the filing  
24 deadline for their response due to an administrative calendaring error that set the due date on a different  
25 date. Defendants sincerely apologize to the Court for their failure to comply with the deadline as a result  
26 of this inadvertent administrative error.

27 The parties conferred and hereby respectfully request the Court to allow a brief extension for  
28

Defendants to file their response to the complaint and set the deadline for June 16, 2025. The parties make this request because Defendants' counsel has been handling multiple cases with emergency deadlines, including a motion for temporary restraining order filed on June 6, 2025, and counsel needs additional time to prepare and to finalize Defendants' response. In view of the agreed-upon extension for Defendants' response to the complaint, the parties request that Defendants must file their motion for summary judgment by August 13, 2025.

Dated: June 13, 2025

Respectfully submitted,<sup>1</sup>

CRAIG H. MISSAKIAN  
United States Attorney

/s/ Elizabeth D. Kurlan  
ELIZABETH D. KURLAN  
Assistant United States Attorney  
Attorneys for Defendants

Dated: June 13, 2025

/s/ Arthur Minas  
ARTHUR MINAS  
Minas Law  
Attorney for Plaintiff

**[PROPOSED] ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

Date: June 17, 2025

  
THOMAS S. HIXSON  
United States Magistrate Judge

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<sup>1</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

**DECLARATION OF ELIZABETH D. KURLAN**

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On May 29, 2025, the Court granted the parties' stipulation to extend time for Defendants' response to Plaintiff's complaint, setting the due date for Defendants' response to May 28, 2025. *See* Dkt. 14. Unfortunately, I inadvertently missed the filing deadline for Defendants' response due to an administrative calendaring error that set the due date on a different date. I sincerely apologize to the Court for this oversight and will be mindful of all set dates moving forward.

3. My office contacted Plaintiff's counsel regarding Defendants' request for a brief period of additional of time to prepare their response to the complaint, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: June 13, 2025

/s/ Elizabeth D. Kurlan  
ELIZABETH D. KURLAN  
Assistant United States Attorney